

Appl. No.: 10/664,316
Amdt. dated 04/12/2006
Reply to Official Action of December 15, 2005

REMARKS/ARGUMENTS

Applicants appreciate the thorough examination of the present application, as evidenced by the first Official Action. The first Official Action rejects all of the pending claims, namely Claims 1-42, under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2004/0176107 to Chadha. As explained below, however, Applicants respectfully submit that the claimed invention is patentably distinct from Chadha and, accordingly, traverse the rejection of the claims as being anticipated thereby. In view of the remarks presented herein, Applicants respectfully request reconsideration and allowance of all of the pending claims of the present application.

Briefly, Chadha discloses a system and method for providing a wireless device with advanced location-based task/reminder functionality. The system includes wireless network infrastructure equipment that itself includes a position detector, and a server for exchanging data information with a remote wireless device. In this regard, the server generates, and sends to the wireless device, an event trigger signal when a predefined condition based on the position of the remote wireless device is met.

According to one claimed aspect of the present invention, as recited by independent Claim 8, a system for providing a differential location service to a terminal includes a service provider and a mapping process. The service provider is capable of receiving, at least partially over a wireless network, a request for a differential location service from the terminal, where the request includes a geographic area defined independent of a specific format. The mapping processor, on the other hand, is capable of receiving the geographic area from the service provider, and transforming the geographic area of the request to thereby define the geographic area in a predetermined manner. The mapping processor can then send the geographic area defined in the predetermined manner to the service provider. And in response, the service provider can determine whether to provide the requested differential location service based upon a comparison of a current location of the terminal and the geographic area defined in the predetermined manner.

In contrast to independent Claim 8, Chadha does not teach or suggest a differential-location-service request including a geographic area defined independent of a specific format,

Appl. No.: 10/664,316
Arndt dated 04/12/2006
Reply to Official Action of December 15, 2005

and a mapping processor for transforming the geographic area to thereby define the geographic area in a predetermined manner. The Official Action appears to interpret a task management engine (110) disclosed by Chadha as corresponding to the recited mapping processor. As disclosed by Chadha, the task management engine obtains position data from a position/location detector to track position-events, and compares the position-events to position-rules that need to be executed. Chadha does not teach or suggest, however, that the task management engine (or any other entity) transforms the geographic area in a differential-location-service request to thereby define the geographic area in a predetermined manner. Chadha does disclose a task management application for receiving locations in a number of different manners, and even discloses that the position data may be expressed in a number of different manners. Even considering such disclosure, however, Chadha does not teach or suggest transforming the geographic area of a request into a particular format (i.e., transform the geographic area to thereby define the geographic area in a predetermined manner), as recited by independent Claim 8.

Applicants therefore respectfully submit that independent Claim 8, and by dependency Claims 9-14, is patentably distinct from Chadha. Applicants also respectfully submit that independent Claims 1, 15, 22, 29 and 36 recite subject matter similar to that of independent Claim 8, including the aforementioned transformation of the geographic area in a differential-location-service request. Thus, Applicants respectfully submit that independent Claims 1, 15, 22, 29 and 36, and by dependency Claims 2-7, 16-21, 23-28, 30-35 and 37-42, are also patentably distinct from Chadha for at least the reasons given above with respect to independent Claim 1. In addition, Applicants respectfully submit that various ones of dependent Claims 2-7, 9-14, 16-21, 23-28, 30-35 and 37-42 recite subject matter further patentably distinct from Chadha, such as those individually addressed below.

A. Dependent Claims 2, 9, 16, 23, 30 and 37

Dependent Claim 9, and similarly Claims 2, 16, 23, 30 and 37, further recites that the service provider is capable of obtaining a current location of the terminal such that the mapping processor can thereafter transform the current location of the terminal to thereby define the

Appl. No.: 10/664,316
Amdt. dated 04/12/2006
Reply to Official Action of December 15, 2005

current location in the predetermined manner. The service provider is then capable of comparing the current location of the terminal defined in the predetermined manner with the geographic area defined in the predetermined manner, and thereafter determining whether to provide the requested differential location service based upon the comparison.

As explained above with respect to Claim 8, Chadha does not teach or suggest transforming the geographic area in a differential-location-service request to thereby define the geographic area in a predetermined manner. Similarly, Chadha does not teach or suggest transforming the current location of a terminal to thereby define the current location in the predetermined manner, as recited by dependent Claim 9 (and similarly dependent Claims 2, 16, 23, 30 and 37). Again, Chadha does disclose expressing a location in a number of different manners. Chadha does not teach or suggest, however, transforming the current location of a terminal into a particular format (i.e., transform the current location to thereby define the geographic area in a predetermined manner).

Applicants therefore respectfully submit that dependent Claims 2, 9, 16, 23, 30 and 37 are patentably distinct from Chadha for at least the foregoing reasons, as well as those provided above with respect to independent Claim 8, and similarly independent Claims 1, 15, 22, 29 and 36.

B. *Dependent Claims 6, 7, 13, 14, 20, 21, 27, 28, 34, 35, 41 and 42*

Dependent Claim 13, and similarly Claims 6, 20, 27, 34 and 41, recites that the request from the terminal further includes an action. Accordingly, the service provider is capable of determining whether to execute the action based upon a comparison of the current location of the terminal and the geographic area defined in the predetermined manner.

In further contrast to the claimed invention, Chadha does not teach or suggest a request from a terminal that includes an action, or a service provider determining whether to execute the action based on a comparison of a geographic area and the current location of the terminal. In this regard, Chadha generally discloses that a wireless service provider determines when a location-based task reminder should be provided to the user of a wireless device. Instead of providing the task reminder itself, however, the service provider merely determines when the

Appl. No.: 10/664,316
Amdt. dated 04/12/2006
Reply to Official Action of December 15, 2005

reminder should be provided, and in response thereto, generates an event trigger signal to transfer to the wireless device. The wireless device, then, executes the task reminder in response to the event trigger. Chadha therefore discloses that, instead of executing actions based on the location of the wireless device, the service provider merely triggers the wireless device to itself execute those actions. Chadha, paragraph 0006 ("a system for causing a wireless device to provide a location-based task functionality"); paragraph 0020 ("the event trigger signal, in addition to or alternatively to generating a reminder alert within the wireless device, cause the start of an application within the wireless device, and/or activate a predefined operating mode of the wireless device"); and paragraph 0027 ("cause the appropriate reminder to be alerted on the user's wireless device and/or carry out the required actions on the wireless device") (emphasis added).

In contrast to Chadha, the terminal of the claimed invention provides a request that includes an action, which the service provider determines whether or not to execute. In Chadha, any action for providing a task reminder is executed at the wireless device, and accordingly, the wireless device need not include an action in any differential-location-service request to the service provider, similar to the claimed invention. One could argue that generation of the event trigger signal corresponds to the recited action. Even in such an instance, however, Chadha does not teach or suggest that the service provider receives an indication of executing an event trigger signal in a request from the wireless device, similar to the action being included in a request in accordance with the claimed invention. Rather, the service provider is preconfigured to generate an event trigger signal in response to satisfaction of certain conditions.

Applicants therefore respectfully submit that dependent Claims 6, 13, 20, 27, 34 and 41, and by further dependency Claims 7, 14, 21, 28, 35 and 42, are patentably distinct from Chadha for at least the foregoing reasons, as well as those provided above with respect to independent Claim 8, and similarly independent Claims 1, 15, 22, 29 and 36. Moreover, Applicants note that dependent Claims 7, 14, 21, 28, 35 and 42 also include the aforementioned current location transformation feature similar to dependent Claims 2, 9, 16, 23, 30 and 37.

For at least the foregoing reasons, Applicants respectfully submit that the rejection of Claims 1-42 as being anticipated by Chadha is overcome.

Appl. No.: 10/664,316
Amdt. dated 04/12/2006
Reply to Official Action of December 15, 2005

CONCLUSION

In view of the remarks presented above, Applicants respectfully submits that the present application is in condition for allowance. As such, the issuance of a Notice of Allowance is therefore respectfully requested. In order to expedite the examination of the present application, the Examiner is encouraged to contact Applicants' undersigned attorney in order to resolve any remaining issues.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,

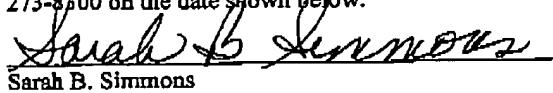


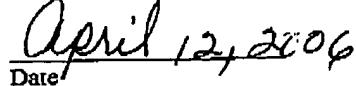
Andrew T. Spence
Registration No. 45,699

Customer No. 00826
ALSTON & BIRD LLP
Bank of America Plaza
101 South Tryon Street, Suite 4000
Charlotte, NC 28280-4000
Tel Charlotte Office (704) 444-1000
Fax Charlotte Office (704) 444-1111

CERTIFICATION OF FACSIMILE TRANSMISSION

I hereby certify that this paper is being facsimile transmitted to the US Patent and Trademark Office at Fax No. (571) 273-8100 on the date shown below.


Sarah B. Simmons


Date